

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOSAPHAT A. PLATER-ZYBERK	:	
and	:	
DIANA ABB CLARKSON	:	
and	:	
SHARON FOX	:	NO. 02-CV-5159
and	:	
CHRISTOPHER GRAVELYN	:	
	:	
vs.	:	
	:	
NORTH AMERICAN VAN LINES, INC.	:	
and	:	
DAVID JONES	:	

**PLAINTIFFS' RESPONSE TO CROSSCLAIM FOR
CONTRIBUTION AND INDEMNIFICATION**

45. Plaintiffs' incorporate the entirety of the complaint and deny each of the "separate" defenses set forth by defendants. By way of further answer, plaintiff Josaphat Plater-Zyberk acted appropriately and with due care at all times relevant to the Complaint and was in no way negligent careless and/or reckless in the ownership, operation, maintenance, management and control of his motor vehicle. Quite to the contrary, as alleged in the Complaint, the accident was caused due solely to the acts and omissions of the defendants, jointly and severally.

46. Denied as a conclusion of law. By way of further answer, see No. 45 above.

WHEREFORE, Plaintiffs respectfully request this Honorable Court dismiss the Defendants' Crossclaim for Contribution and Indemnification.

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